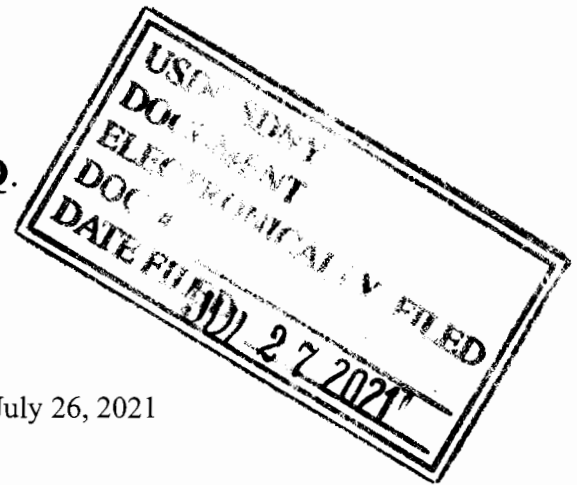


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July 26, 2021

**Via ECF and E-Mail**

Honorable George B. Daniels  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

SO ORDERED:

*George B. Daniels*  
George B. Daniels, U.S.D.J.  
JUL 27 2021

Re: *United States v. Quaveon Ross*  
20 Cr. 57-21 (GBD)

Dated: \_\_\_\_\_

Dear Judge Daniels:

As Your Honor is aware, I am counsel to Mr. Quaveon Ross, the above-referenced defendant. This letter is submitted to request an extension of the deadline to file pretrial motions, which is currently August 2, 2021.

We are presently engaged in discovery review as well as plea discussions with the Government that will affect Mr. Ross's pretrial motions. Thus, to allow time to continue discovery review and plea discussions, we respectfully request a 45-day extension to the motion schedule: defense motions to be submitted on or before September 16, 2021; the Government's Response to be submitted on or before October 28, 2021; and defense Reply to be submitted on or before November 11, 2021. Based upon my communications with A.U.S.A. Peter Davis, the Government has no objection to this request.

We appreciate the Court's attention to this matter.

Respectfully submitted,

/s/ Richard Ma

Richard J. Ma, Esq.

cc (vie email): A.U.S.A. Peter Davis (via email)